

**BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554**

In the Matter of	)	
	)	
Application by SBC Communications Inc.,	)	
Nevada Bell Telephone Company, and	)	WC Docket No. 03-10
Southwestern Bell Communications Services,	)	
Inc. for Provision of In-Region, InterLATA	)	
Services in Nevada	)	

**AFFIDAVIT OF KEITH FREDERICK**

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**SCHEDULE OF ATTACHMENTS**

- Attachment A**    Voter/Consumer Research Inc. Firm Information
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I, KEITH FREDERICK, being of lawful age, and duly sworn upon my oath, do hereby depose and state as follows:

**PROFESSIONAL EXPERIENCE**

1. My name is Keith Frederick. I am a pollster and the president and owner of FrederickPolls LLC (“FrederickPolls”), a public opinion and polling firm. My business address is 1000 Wilson Boulevard, Suite 2525, Arlington, Virginia 22209.
2. As president of FrederickPolls, I am responsible for managing all aspects of focus group, telephone, and online opinion research projects for corporate, non-profit, association and political clients. I supervise and participate in the design of these projects, their statistical analyses, their execution, and the presentation of their results. I also supervise, direct and work with the calling centers that perform FrederickPolls’ telephone interviews.
3. I received my Bachelor of Science degree from Clemson University with a major in political science and a minor in statistics in 1977, and pursued graduate work in quantitative political science at Virginia Tech from 1977 to 1979. I began my career in polling and opinion research in 1979 with the Washington, D.C. firm of Hamilton and Staff, where I specialized in both political and public affairs polling. In 1984, I became a name partner at the firm. From 1989 to 1999, I was lead partner at Frederick Schneiders, Inc., which was acquired in 1995 and became Frederick Schneiders Research. In 1999, I founded FrederickPolls LLC.
4. Since the inception of my polling career 24 years ago, I estimate that I have managed well over 2,000 telephone interview polls, including their design and execution. My substantive areas of research expertise include telecommunications policy, electric

utilities market restructuring, health care policy and growth politics. I have served a diverse combination of corporate, political and public affairs clients. Prior utility and telecommunications clients include Qwest, AT&T, Entergy, Florida Power & Light, TECO, New York State Electric & Gas, the Pennsylvania Public Utility Commission, and the Florida Cable TV Association. Other clients include Emory University, Blue Cross/Blue Shield of North Carolina, the American Hospital Association, the Kaiser Family Foundation, and Philip Morris USA.

### **PURPOSE OF AFFIDAVIT**

5. Nevada Bell Telephone Company (“Nevada Bell”) recently commissioned Frederick Polls to perform a telephone survey of subscribers of Cricket Communications, Inc.’s (“Cricket”) broadband PCS service in the Reno, Sparks and Carson City market.<sup>1</sup> The survey I undertook is similar to a survey I previously performed for Qwest related to Cricket’s service in New Mexico.
6. My affidavit explains that the survey was designed to (a) statistically estimate the number of Cricket subscribers in Nevada Bell’s service territory and (b) determine whether more than a *de minimis* number of those subscribers are using Cricket broadband PCS service as a replacement for Nevada Bell’s residential local wireline service. Notably, the definition of “replacement” utilized in this survey is intentionally conservative. The survey instrument uses two separate and specific measures to determine how many

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<sup>1</sup> Cricket currently offers customers in Reno, Sparks and Carson City a flat-rated unlimited wireless calling plan for calls within Cricket’s calling area for \$32.99 per month, with long distance calls at 8 cents per minute. See <http://www.cricketcommunications.com/cricketareas.asp?id=22>. It is my understanding that the Cricket service area falls almost entirely – if not entirely – inside Nevada Bell’s local service territory. For a discussion of Cricket’s market strategy and entry into the Nevada Bell service territory, see the Affidavit of J. Gary Smith attached to Application by SBC Communications Inc., Nevada Bell Telephone Company, and Southwestern Bell Communications Services, Inc., for Provision of In-Region, InterLATA Services in Nevada, WC Docket No. 03-10 (FCC filed Jan. 14, 2003) (App. A., Tab 19).

Cricket customers have substituted Cricket service for wireline service in their homes – (1) those who do not now have home wireline phone service and (2) those who have no home wireline phone service but previously subscribed to such service prior to deciding to initiate Cricket service. This represents just one of four possible types of wireline phone substitution – and thus is a conservative measure of wireline replacement.<sup>2</sup>

7. I have reviewed the affidavit of J. Gary Smith filed in support of SBC's application for section 271 relief in Nevada and, in particular, his discussion of Cricket's broadband PCS service as a commercial alternative for residential customers in Nevada Bell's serving area. The results of the survey I undertook support the analysis set out in Mr. Smith's affidavit and, indeed, demonstrate that it set forth a conservative estimate of the extent of broadband PCS landline replacement in Reno, Sparks and Carson City. As set forth in detail below, the survey demonstrates that (a) there are a large number (more than 15,000) of Cricket subscribers in the Reno, Sparks and Carson City market, and (b) a significant number (more than 2,800) of those subscribers are using their Cricket broadband PCS service to replace Nevada Bell's residential wireline service. In fact, through the survey process of calling one in five potential Cricket phone numbers, we specifically identified 345 Cricket customers who do not currently have wireline phone service in their home and disconnected or terminated such service because they decided to subscribe to Cricket service. These results unequivocally demonstrate that more than a

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<sup>2</sup> Wireline replacement also occurs in other ways. For instance, replacement occurs when a would-be residential wireline customer decides not to purchase wireline service but instead purchases Cricket's broadband PCS service for use as his/her primary telephone service. Similarly, replacement occurs when an existing wireline customer retains his/her primary wireline but chooses to terminate a second or additional wireline in favor of Cricket's broadband PCS service. Finally, replacement occurs when an existing wireline customer purchases Cricket's service for a household member instead of purchasing a second or additional wireline. In each case, the Cricket service replaces a wireline that would be purchased but for the substitution of the Cricket service – demonstrating that the Cricket service is an actual competitive alternative to wireline service.

*de minimis* number of residential customers in Nevada Bell's service territory have replaced their wireline service with Cricket's broadband PCS service, and thus clearly support the conclusions reached in Mr. Smith's opening affidavit.

## **SURVEY METHODOLOGY**

8. The survey FrederickPolls performed for Nevada Bell was designed to (a) statistically estimate the number of Cricket subscribers in Nevada Bell's service territory and (b) determine whether more than a *de minimis* number of those subscribers are using Cricket broadband PCS service as a replacement for Nevada Bell's residential local wireline service. FrederickPolls developed the methodology for selecting the sample pool, designed the survey questionnaire, supervised the conduct of the telephone survey, and analyzed the survey results. Throughout the process, I worked closely with the public opinion research firm Voter/Consumer Research Inc. ("V/CR"), which was responsible for placing the telephone calls to the sample pool from its computer-assisted call center in Houston, Texas. (Attachment A provides information regarding V/CR.) Dr. Jan van Lohuizen, V/CR's President and Founder, reviewed the survey questions, the survey design and the analysis of the survey results. V/CR Vice President Dan Kessler supervised all data collection aspects of the project including sampling, telephone calling, interviewing instructions, Spanish language translation of the questionnaire, call disposition record keeping and data entry of results.
9. The initial survey task was to develop the methodology to identify the sample pool. According to the North American Numbering Plan Administration's web site,<sup>3</sup> Leap

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<sup>3</sup> See <http://www.nanpa.com>.

Wireless Intl., Inc. dba Cricket Communications, Inc., has been assigned four (4) sets of NPA/NXX numbers in Nevada (all in the Reno or Carson City rate centers): 775/303; 775/378; 775/379; and 775/443.<sup>4</sup> Each NPA/NXX represents ten thousand telephone numbers. Therefore, Cricket has been assigned a total of 40,000 telephone numbers in Nevada Bell's service territory.

10. From the pool of 40,000 telephone numbers assigned to Cricket, we randomly selected 8,000 for the survey – one in five. The numbers were selected pursuant to a sampling technique designed to give every telephone number assigned to Cricket an equal chance of inclusion in the sample. The technique minimized any geographic or temporal order bias that could have resulted from Cricket's pattern of assigning telephone numbers to customers (if any such pattern existed). We used a computer statistical package to randomly assign to each of the 40,000 potential Cricket telephone numbers a number between one (1) and forty (40). This yielded forty (40) random groups of 1,000 telephone numbers each. We then selected for inclusion in the sample pool all telephone numbers that had been assigned the numbers one (1) through eight (8), for a total survey pool of 8,000. This large sample pool yields a very robust level of statistical reliability.
11. Our next task was to design a survey questionnaire with clear and comprehensible questions. The survey was designed in order to obtain responses only from those persons who pay the bill for the Cricket broadband PCS service ("Respondents"). After asking how long the Respondent has had his or her Cricket service, Respondents were read the following statement for context:

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<sup>4</sup> As previously noted, Cricket only operates in the Reno, Sparks and Carson City markets in Nevada. The "775" NPA represents the applicable area code for northern Nevada. The NXX identifies the first three digits of a seven-digit telephone number.

**Some Cricket customers might choose to NOT have traditional wireline local telephone service in their home and, instead, use their Cricket phone for all of their calling needs.**

Respondents were then asked:

**Do you have wireline local telephone service in your home?<sup>5</sup>**

If Respondents answered “No” to the foregoing question, they were then asked:

**Did you previously have in your home, wireline local telephone service that was disconnected or terminated because you decided to have a Cricket phone?**

Lastly, we recorded the Respondent’s age and gender. (Attachment B is a copy of the survey questionnaire.)

## **SURVEY EXECUTION**

12. Having identified the sample pool and designed the survey questionnaire, we began calling the 8,000 Cricket telephone numbers. The survey calls were made between February 1<sup>st</sup> and February 6<sup>th</sup>, 2003. Calls were placed between the hours of 5:00 pm and 9:00 pm Pacific Standard Time on weekdays, between the hours of 10:00 am and 4:00 pm Pacific Standard Time on Saturday, and between the hours of 1:00 pm and 8:00 pm Pacific Standard Time on Sunday.
13. V/CR’s highly trained and supervised interviewers placed the calls from V/CR’s Computer-Assisted Telephone Interviewing (“CATI”) stations in Houston, Texas. All of

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<sup>5</sup> If Respondents expressed confusion regarding the meaning of “wireline local telephone service,” the following definition was provided: “By wireline local telephone service we mean dial-tone phone service provided by your local phone company that allows you to make and receive phone calls by plugging your home phone into a wall-jack.”

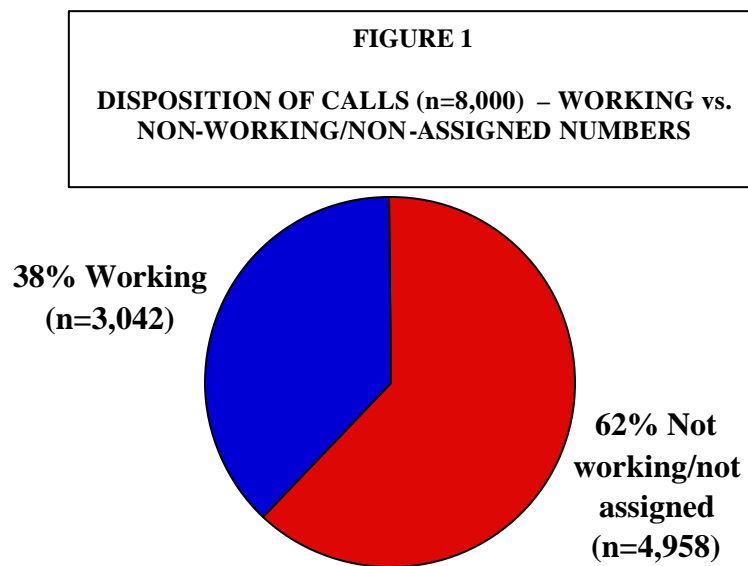
V/CR's interviewers have successfully completed intensive training that exposed them to real-world interviewing situations, and they are constantly monitored and supervised by monitors who can unobtrusively listen to an interviewer's telephone line and pull up the interviewer's computer display. V/CR maintains an excellent supervisor-to-interviewer ratio of 1:12.

14. Calls were initially placed using V/CR's computer-assisted predictive dialing technology. This technology uses a computerized dialer loaded with the entire sample pool of telephone numbers to be called. After the computer dialed the number, an interviewer listened to the result of that call. If a live contact was established, the interviewer proceeded with the interview process. If the contact was an answering machine, messaging service, busy signal, or no answer, the interviewer recycled the number for redialing at a later time. If the number called was disconnected or otherwise out-of-service, the interviewer noted that fact and marked the disposition as final.
15. Once a "live" person was obtained on the line, the interviewer first asked if that person was responsible for paying the Cricket phone bill. If the person answered affirmatively, the interview proceeded. However, if the person answered "no," the interviewer requested the name and telephone number of the responsible billpayer. Attempts were then made to contact the new "forwarded billpayer" telephone number.
16. V/CR made five callback attempts if the result of a call (to an initial telephone number assigned to Cricket, or to a "forwarded billpayer" number) was an answering machine, messaging service, no-answer, or a scheduled callback (i.e., an indication from the person receiving the call that it would be better to call back at a particular time). Numbers with repeated busy signals (both fast and normal) were called approximately 12 to 15 times –



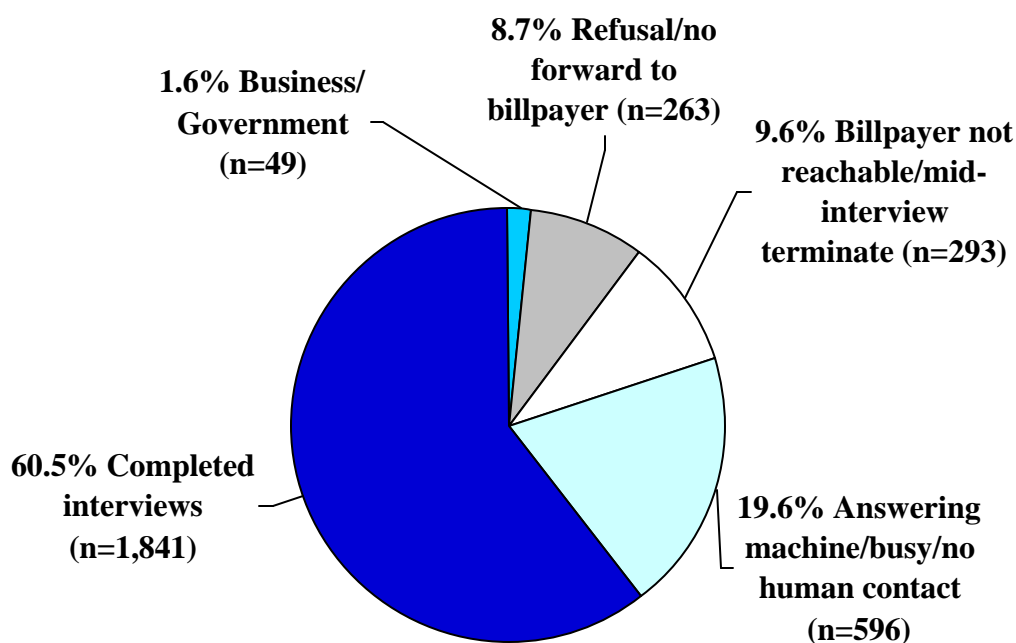
or four to five callback attempts, each consisting of three (3) consecutive calls. Callbacks were spread out over a number of days during the interview period. This process represents a rigorous attempt to accurately determine the status of a Cricket-assigned number and obtain completed interviews. Our callback practice comported with standard, accepted industry practice.

17. Of the 8,000 Cricket numbers called, 4,958 (or 62%) were either not working or unassigned. 3,042 (or 38%) of the numbers called were working. For a breakdown of the disposition of all 8,000 numbers called, see Figure 1.



18. Of the 3,042 assigned/working telephone numbers, we successfully contacted and conducted interviews with 1,841 billpayers, a total of 60.5%.<sup>6</sup> In my experience, this represents an exceptionally high response completion rate for a telephone survey. Interview completion rates for telephone surveys are more typically in the neighborhood of 12% to 25%.<sup>7</sup> For a breakdown of the disposition of the calls to assigned/working numbers, see Figure 2.

**FIGURE 2**  
**DISPOSITION OF CALLS TO**  
**ASSIGNED/WORKING PHONE NUMBERS**  
**(N=3,042)**



<sup>6</sup> 163 (8.9%) of the interviews were conducted in Spanish. The remaining interviews were conducted in English.

<sup>7</sup> See, e.g., Charlotte Steeh, et al., *Are They Really as Bad as They Seem? Nonresponse Rates at the End of the Twentieth Century*, 17 *Journal of Statistics* 227, 227-28 (2001) (the Council for Marketing and Opinion Research “calculates average response rates . . . that range from 25 percent for all types of samples to 12 percent for RDD [random digit dial] samples”).

In my opinion, the number of callbacks, the very high response ratio, and the number of completed interviews make it very unlikely that there could be any significant non-response bias with regard to the survey.

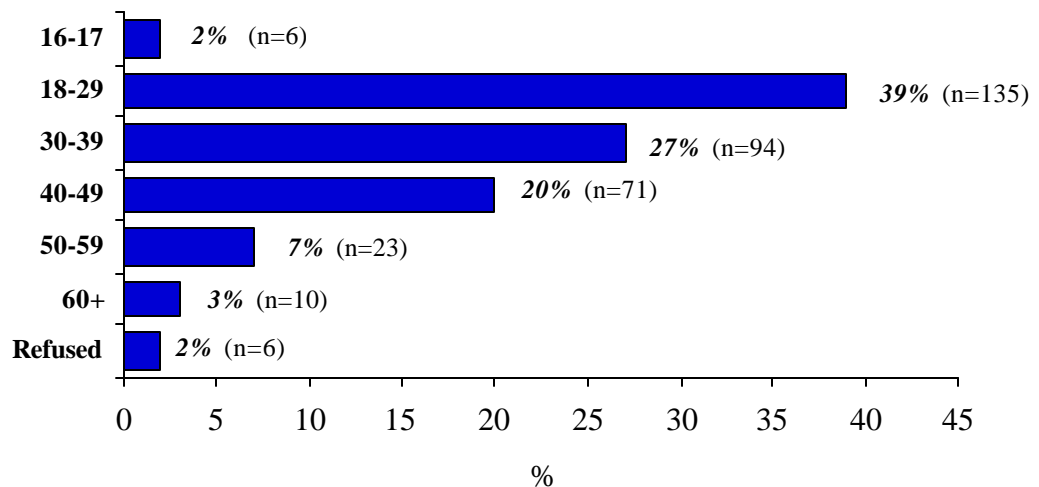
## **SURVEY RESULTS**

19. Based upon the survey, we found that 4,958 (62%) of the 8,000 telephone numbers called resulted in a “fast busy” signal or disconnection message, which indicated that the telephone number was not assigned to an active Cricket customer or was otherwise not in service. As described above, we determined that “fast busy” lines may not be in service by making numerous callback attempts, in approximately four to five interspersed groups of three calls. The remaining 3,042 (38%) of the 8,000 telephone numbers called were telephone numbers that our interviewers determined were working numbers – either because the calls resulted in an interview, a “live” person who refused an interview, an answering machine, messaging service, a normal busy signal, a normal ringing tone with no answer, refusal to provide forwarding information about the phone’s billpayer or another indication of a working number.
20. These results indicate that as of February 2003, Cricket had active subscribers for approximately 15,200 (38%) of the 40,000 phone numbers assigned to it in Nevada. The exceedingly large sample size makes this finding extremely reliable: one in five numbers assigned to Cricket was called, and the margin of error was plus or minus 1% at the 95% confidence level. Notably, the survey results compare favorably to publicly available market information filed by Cricket with the Public Utilities Commission of Nevada, which indicates that Cricket had an average of approximately 15,346 active customers

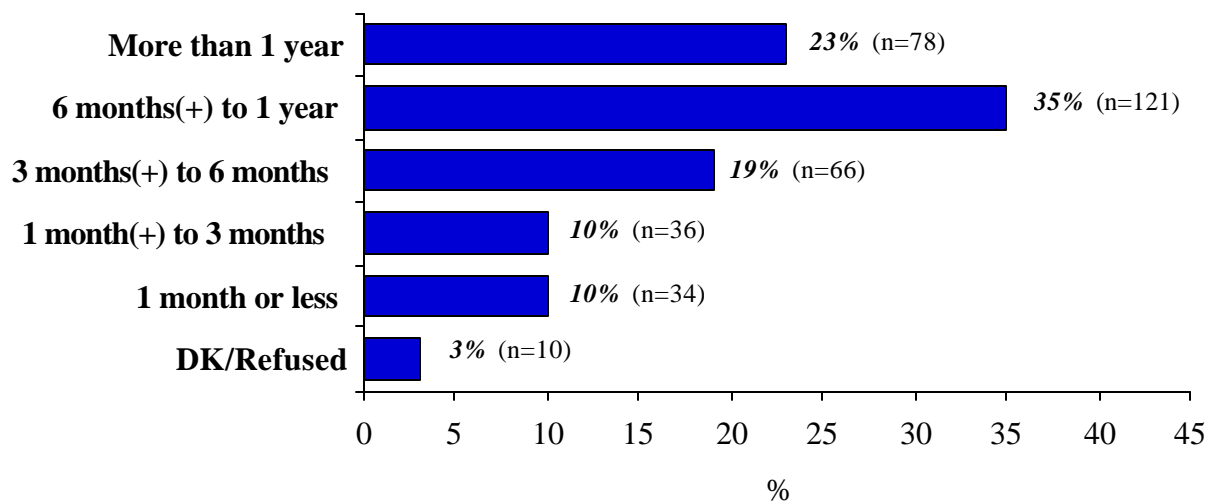
lines during the fourth quarter of 2002. See the Reply Affidavit of J. Gary Smith, ¶ 15 n.23.

21. Based upon the survey, we further found that 345 (18.7%) of the Cricket billpayers interviewed have terminated their pre-existing residential wireline local telephone service in its entirety and have no wireline local telephone service in their homes. The following graphs show the breakdown by age and length of Cricket phone service of these 345 Cricket billpayers who have substituted Cricket service for prior wireline service.

**Age of Those Non-Wired/Previously Wired**



**Length of Cricket Service of Those Non-Wired/Previously Wired**



22. These results indicate that as of February 2003, approximately 2,842 (18.7% times 15,200) Cricket customers in Nevada Bell's service territory have terminated their previous residential wireline local telephone service. The margin of error for this result is plus or minus 2.3% at the 95% confidence level.<sup>8</sup> This is a very robust sample size and well-exceeds industry standards for a telephone survey. The survey uses a 1,841-answer sample to determine the behavior of a population of approximately 15,200 Cricket customers. By contrast, the standard sample size of national news organization polls reporting opinions of all 286 million Americans is 1,000 completed interviews.
23. For a more complete analysis of the survey results, see Attachment C.

## **CONCLUSION**

24. The survey reliably demonstrates that a significant number of Cricket customers in Nevada Bell's service territory are using their Cricket broadband PCS service to replace their residential wireline local exchange service. Using a conservative definition of "replacement," the survey resulted in interviews with 345 subscribers who have disconnected their residential wireline local telephone service and utilize Cricket's service for all their residential calling needs. This number alone represents more than a

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<sup>8</sup> For purposes of this calculation, we have counted only those Respondents who answered "no" to the question of whether they have a wireline local telephone service, and "yes" to the question of whether they previously had a wireline local telephone service that was disconnected because of the decision to purchase Cricket service. As previously noted, this is a conservative estimate of replacement. For example, by counting all those Respondents who answered "no" to the question of whether they have a wireline local telephone service in their home, we would potentially include those persons who did not previously have a wireline phone but would have obtained one but for the purchase of Cricket's broadband PCS service. Using this slightly broader definition of replacement, the survey results would indicate that as of February 2003, approximately 7,524 (49.5%) Cricket customers in Nevada Bell's service territory have no wireline local telephone service in their homes, and the margin of error for this result is plus or minus 2.3 % at the 95% confidence level.

*“de minimis”* number of customers. Statistical application of the survey results to all Cricket customers in the Nevada Bell service territory, moreover, yields the conclusion that over 2,800 subscribers have disconnected their residential wireline local telephone service and are utilizing their Cricket service for all their residential calling needs. This survey unequivocally establishes that Cricket represents a “competitive alternative” to Nevada Bell’s residential wireline local telephone service – as previously established in the Affidavit of Mr. J. Gary Smith.


25. This concludes my affidavit.

COMMONWEALTH OF VIRGINIA )  
 )  
COUNTY OF ARLINGTON )

I declare under penalty of perjury that the foregoing is true and correct.

Keith Frederick  
Keith Frederick

Subscribed and sworn to before me this 13 day of February, 2003

  
\_\_\_\_\_  
Notary Public

**Frederick Affidavit – Attachment A**





## **Voter Consumer Research Inc.**

*A premier public opinion survey research and  
data collection company.*

Voter Consumer Research provides professional market research data collection and tabulation services to a wide spectrum of clients. Some of our clientele include public and private corporations, health care facilities, full service research firms, consultants, public relations and public affairs firms, advertising agencies, and university research centers.



- Accurately sampled web surveys
- 185 fully monitored CATI stations
- ACS Query data collection software
  
- Bilingual research capabilities
- Accustomed to low and high incidences
- Predictive dialing when appropriate
  
- Superior project management
- Precise programmers
- Competitive pricing
  
- One on one interviewing
- Focus and mini groups
- Unrivalled recruiting staff
  
- Unmatched standards of quality
- Highly experienced
- Knowledgeable, professional staff

## **OUR STAFF**

### **Dr. Jan van Lohuizen**



Jan is the President and one of the founding members of the firm. He has directed public opinion research projects since 1977. His area of expertise is in public policy and elections research. He has conducted opinion research for hundreds of political campaigns. Jan's principal emphasis today is on surveys for initiative and referendum campaigns and opinion research on public policy issues. Clients include numerous Republican Senators and Congressional Representatives, major U.S. corporations, industry associations, and think tanks. He is also the chief pollster for President George W. Bush.

### **Jerry Goins**



Jerry first entered the market research arena in 1983, shortly after graduating Summa Cum Laude at the University of Texas in Austin. He first served as an interviewer working his way up to field supervisor, then as the co-director of interviewing for Tarrance and Associates, a 160 station interviewing facility. He was also the principal translator / field director for all Hispanic studies at Tarrance and Associates and for the Gallup Organization. As one of the founding members, today he leads as the Executive Vice President.

### **Daniel Kessler**



Dan serves as Vice President of Voter Consumer Research. He takes the lead role in all operational research-related aspects of the company and is responsible for insuring that the phone bank adheres to the strict methodological standards of interviewing. Before coming to VCR, Dan worked with Jerry at Tarrance and Associates as co-director of interviewing and he held various positions for the Gallup Organization. Additionally, he manages the scheduling and fielding of all projects and insures their correct implementation in the field. Dan has worked at all levels within the company, from interviewing and supervising to developing and implementing the company's CATI system.

**Gloria Duda**, Director of Qualitative Research, has been directing both qualitative and quantitative research projects since 1965. She has served as field director for numerous full service and consulting firms and has established data collection agencies across the nation. Gloria brings ground-up, hands-on expertise to all aspects of the research process, thereby proving herself as an asset to Voter Consumer Research.

## **MISSION STATEMENT**

***"Our Primary Objective Is To Be More Than A Provider Of Research Services  
– We Want To Be Strategic Partners With Our Clients."***

***– Jan van Lohuizen, Ph.D. President***



***The Bottom Line Is That Detail And Quality Are Of Paramount Importance Here At VCR.***

**UNPARALLELED CLIENT SUPPORT:**

The cornerstone of our success over the years has been our enduring ability to successfully administer thousands of research projects. Our clients continually depend on our record of consistency and the knowledge we have gained about the ever-changing research industry.

We support them by informing them with daily progress with their projects on a one on one basis. To improve constant communication with our clients, an associate from our staff is designated to managing their particular research project.

This approach provides better support by one main contact answering all questions, changes, and concerns regarding a project whenever vital information is needed.

**QUALITY WORK CONTRIBUTES TO WINNING AGENDAS:**

Foremost on our agenda is that we constantly strive to produce quality work for our clients. Our well trained team of interviewers work side by side under close direction of our quality control supervisors.

Our internal network enables our supervisors to unobtrusively view, listen, and monitor every interview. We relentlessly search for the best solutions to improve our interviewing department, thereby meeting and exceeding your needs.

We also offer a remote client interview monitoring system, enabling you to listen to your research project while it's in the field from anywhere in the world.

## **QUANTITATIVE DATA COLLECTION**

Voter Consumer Research utilizes over 185 fully automated Computer Assisted Telephone Interviewing (CATI) stations.

**A telephone center is only as good as its interviewers.** Our team of trainers have adopted the MRA guidelines of telephone interviewing so that our interviewing staff can excel in providing our clients with quality data.

The training program rigorously details this strict adherence to these tried and true methodological practices of interviewing. Some of the items addressed during training include:

- **Proper interviewing methodology**
- **Techniques to prevent bias**
- **Good probing habits**
- **Methods to overcome rebuttals and improve refusal conversions**
- **Use of the ACS Query CATI software**

VCR interviewers are first exposed to “real-world” interviewing via our in-house custom designed training survey, which allows them the opportunity to practice their interviewing techniques in a real-world setting.



**BILINGUAL INTERVIEWING:** Through the expertise and guidance of Jerry Goins, our bilingual interviewing team proves to be one of the best in the industry. Throughout the years, we have successfully administered thousands of bilingual research projects ranging from customer satisfaction surveys to complex technology related surveys.

Our first priority in considering an interviewer to be on our bilingual staff is they must have demonstrated outstanding performance as an interviewer on a repeated basis. The interviewer is then required to successfully pass a Spanish reading test with Mr. Goins. Once this process is complete, the interviewer can then join our Spanish team.

As part of our CATI system, English-only speaking interviewers can route Spanish calls to Spanish speaking interviewers, thereby allowing them call back the respondent to begin the survey in Spanish.

Additionally, as a quality control measure, our surveys are translated to appeal to the many different dialects of the Spanish language. For instance, if VCR were conducting a survey here in Texas, Mr. Goins, our translation specialist, would translate the survey in a Mexican American dialect. However, if we were conducting a survey in Miami, Florida, the dialect would appeal to Cuban Americans.

**ACCURATE CATI PROGRAMMING:** An important component of any successful CATI-based project is the quality of the CATI programming staff and the software package used. VCR has a wealth of talented and accurate technicians to ensure your questionnaires are implemented correctly in the field without compromising efficiency. VCR uses the *ACS-Query*™ software platform for programming and conducting quantitative data collection.

This powerful software tools gives our programmers the freedom they need to meet virtually any client request, from simple skip patterns to complex conditional statements. The software includes an efficient quota system which affords you the ability to implement any number of quota definitions.

## **QUALITATIVE RESEARCH DIVISION**

*Mystery shopping, product placement, executive interviewing, recruiting, and focus group facility*

### **LOCATION IS EVERYTHING...**

- ✓ Houston is the fourth largest city in the United States!
- ✓ VCR is just twenty minutes from Bush Intercontinental Airport
- ✓ Several fine hotels at the airport means you are just minutes away from your departure gate
- ✓ Mid to upper income respondent base with wide ethnic diversity
- ✓ The region offer both high tech and traditional target markets

### **QUALITY AND COMFORT...**

- ✓ Relaxing environment for lively conversation and debate
- ✓ Our 12 x 24 ft focus group room comfortably accommodates 10 respondents with an unobstructed camera view
- ✓ The 10 x 12 ft viewing room comfortably holds 6 clients
- ✓ Unique ganging keystone table provides an unobstructed view of respondents in groups
- ✓ Office supplies for any need
- ✓ Private work space
- ✓ Canon VC-3 remote operated video with monitor
- ✓ 21 inch monitor so you can keep an eye on groups while on a phone call or simply taking a break

### **EXPERIENCE MATTERS...**

- ✓ Nearly a century of experience among the principals of VCR
- ✓ Hands on management by Director, Ms. Duda
- ✓ A staff of professional, highly trained recruiters
- ✓ Courteous, accommodating staff
- ✓ Gloria Duda is the chief designer of our cross referencing database, utilizing a 65 thousand name VIRGIN respondent base

*Moderating available: Through a series of partnerships with existing clients, we have the ability to conduct executive interviews and focus groups with business and consumers covering topics from customer satisfaction to complex technology issues.*

## **HOUSTON AND VOTER CONSUMER RESEARCH**

**LOCATION  
COMFORT  
QUALITY  
EXPERIENCE  
ALL IN THE 4<sup>TH</sup> LARGEST CITY IN THE U.S.**

## **MANAGING THE INTERNAL PROCESS**

**STRATEGIC SAMPLE MANAGEMENT:** VCR uses several sample vendors including Survey Sampling, Inc. and Experian. We are able to pull RDD, listed, or targeted samples by geography, demographics, and psychographics.

*However, VCR recognizes that obtaining the proper sample is only half the battle.*

The other half is ensuring that the sample is properly managed while your project is in the field. Our software allows us to efficiently control the release of sample and to manage sample once it has been released so that all respondents have an equal chance of being contacted.

Only by careful sample management can reliable, statistically accurate results be obtained.

**RELIABLE DATA PROCESSING:** Upon completion of a project, the focus turns to reporting on the results obtained. Statistical data processing encompasses the tabulation of the data collected. VCR uses the SPSS statistical package, a well-known and popular software package, for its data processing.

This software allows us to combine large amounts of information into a single display, enabling us to prepare customized tables suitable for publication or presentation.

Standard computer analyses that are produced include aggregates or marginal distributions, banner & stub or portrait tables, and cross-tabulations. Tabulated data can be delivered via e-mail in a number of formats, or hardcopies can be printed on site and shipped to your office.

## **FOR ADDITIONAL INFORMATION:**

Daniel Kessler  
Vice President  
Email: dan@vcrhouston.com  
Phone: (281) 893-1010  
Fax: (281) 893-8811  
3845 FM 1960 West  
Suite 440  
Houston, TX 77068

**Frederick Affidavit – Attachment B**



## ATTACHMENT B

CRICKET NEVADA – BILL PAYER

JOB 1742

THIS QUESTIONNAIRE IS THE EXCLUSIVE PROPERTY OF FREDERICKPOLLS  
DO NOT REPRODUCE WITHOUT PERMISSION FROM FREDERICKPOLLS

PHONE (      )	-10	ID CODE	-14
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**READ:** Hello, [NAME OF RESPONDENT], my name is \_\_\_\_\_ calling on behalf of  
Voter/Consumer Research, a national research firm. We are conducting a very brief survey of the  
owners of Cricket phones. This is not a sales call.

**ASK FOR PERSON NAMED, IF HAVE ONE – GO TO Q1**

***IF NOT, ASK:***

A. We understand that you or a person in your family has  
Cricket phone service. Are you the person who pays  
the bill for this Cricket phone?

-15

Yes [**GO TO Q1**]\_\_\_\_\_ -1  
No/Don't Know/Refused\_\_\_\_\_ -2

**IF NO/DK, ASK:** Could I please speak to that person?

1. How long have you had this Cricket phone  
service? [**RECORD RESPONSE; DO  
NOT ASK RESPONSE CATEGORIES  
UNLESS NECESSARY**]

-16

One month or less\_\_\_\_\_ -1  
Between 1 and 3 months [*include "3 mos."*]\_\_\_\_\_ -2  
Between 3+ and 6 months [*include "6 mos."*]\_\_\_\_\_ -3  
Between 6+ mos. and 1 year [*include "1 year"*]\_\_\_\_\_ -4  
More than 1 year\_\_\_\_\_ -5  
Don't Know/Refused\_\_\_\_\_ -6

**FINAL – FIELD COPY**

2. Some Cricket customers might choose to NOT have traditional wireline local telephone service in their home and, instead, use their Cricket phone for all of their calling needs.

-17

Do you have wireline local telephone service in your home? [IF R. UNSURE OF WHAT “LOCAL TELEPHONE SERVICE” MEANS, READ:

Yes [GO TO Q4]\_\_\_\_\_ -1

No \_\_\_\_\_ -2

Don't Know/Refused [GO TO Q4]\_\_\_ -3

“By wireline local telephone service we mean dial-tone phone service provided by your local phone company that allows you to make and receive phone calls by plugging your home phone into a wall-jack.”

[IF “NO WIRELINE LOCAL TELEPHONE SERVICE”]

-18

3. Did you previously have in your home, wireline local telephone service that was disconnected or terminated because you decided to have a Cricket phone?

Yes, had wireline\_\_\_\_\_ -1

No, did not have\_\_\_\_\_ -2

Don't Know/Refused\_\_\_\_\_ -3

4. Gender. (*DON'T ASK; JUST RECORD*)

-19

Male\_\_\_\_\_ -1

Female\_\_\_\_\_ -2

5. Could you please tell me – is your age between 18-29, 30-39, 40-49, 50-59, 60-64, or 65 and over? [IF “OTHER”, ASK: What is your age?]

-20

18-29\_\_\_\_\_ -1

30-39\_\_\_\_\_ -2

40-49\_\_\_\_\_ -3

50-59\_\_\_\_\_ -4

60-64\_\_\_\_\_ -5

65-Up\_\_\_\_\_ -6

[VOL] 16-17\_\_\_\_\_ -7

Refused\_\_\_\_\_ -8

**THANK YOU VERY MUCH.**

**(INTERVIEWER: GO TO FRONT SHEET AND VERIFY:)**

**PHONE NUMBER**

**FILL IN OTHER INFORMATION**

**FINAL – FIELD COPY**

**Frederick Affidavit – Attachment C**

## ATTACHMENT C

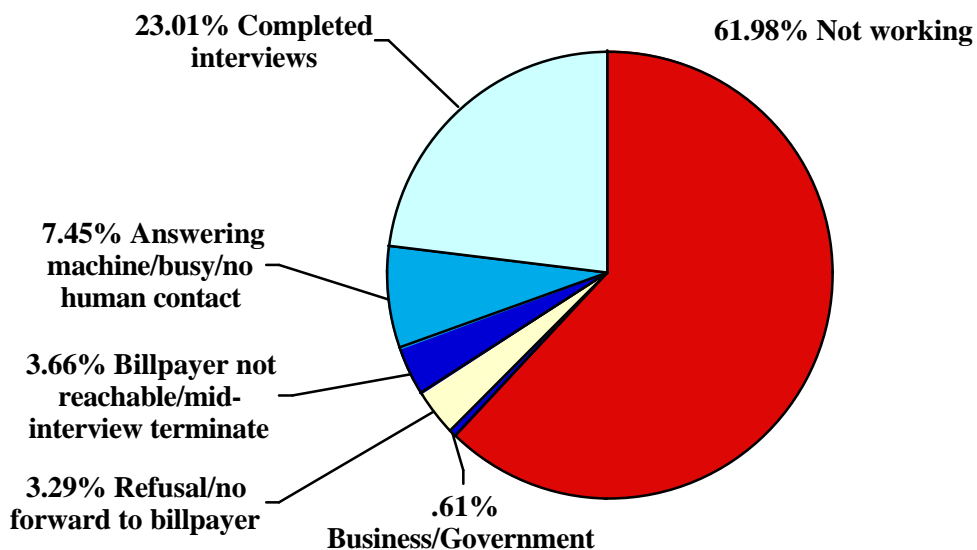
### Cricket Billpayer Survey Analysis

#### Reno/Carson City/Sparks, Nevada Market

- Sample Size: n=1,841
- Margin of Error: 2.3%
- Interview Dates: February 1-6, 2003
- Eligibility: Cricket Phone Billpayer

#### 1. Call Disposition

Calls were made to 8,000 potential Cricket telephone numbers. The call disposition for those numbers was as follows:



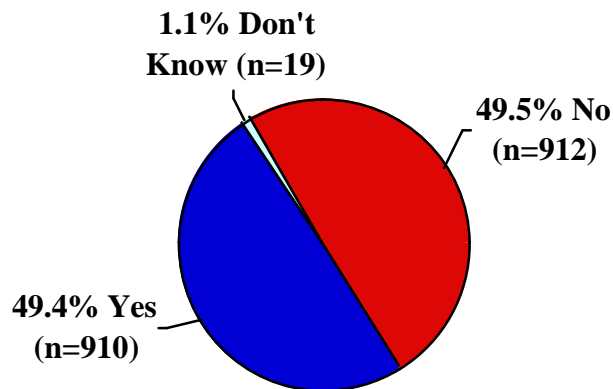
#### \* Raw Numbers

n=4,958	Not assigned/not working (61.98%)
n=1841	Completed interviews (23.01%)
n=596	Answering machine/busy/no human contact (7.45%)
n=293	Billpayer not reachable/ mid-interview terminate (3.66%)
n=263	Refusal/no forward to billpayer (3.29%)
n=48	Business (.60%)
n=1	Government (.01%)
n=8000	Total

## 2. Cricket Customers With No Wireline Home Phone Service.

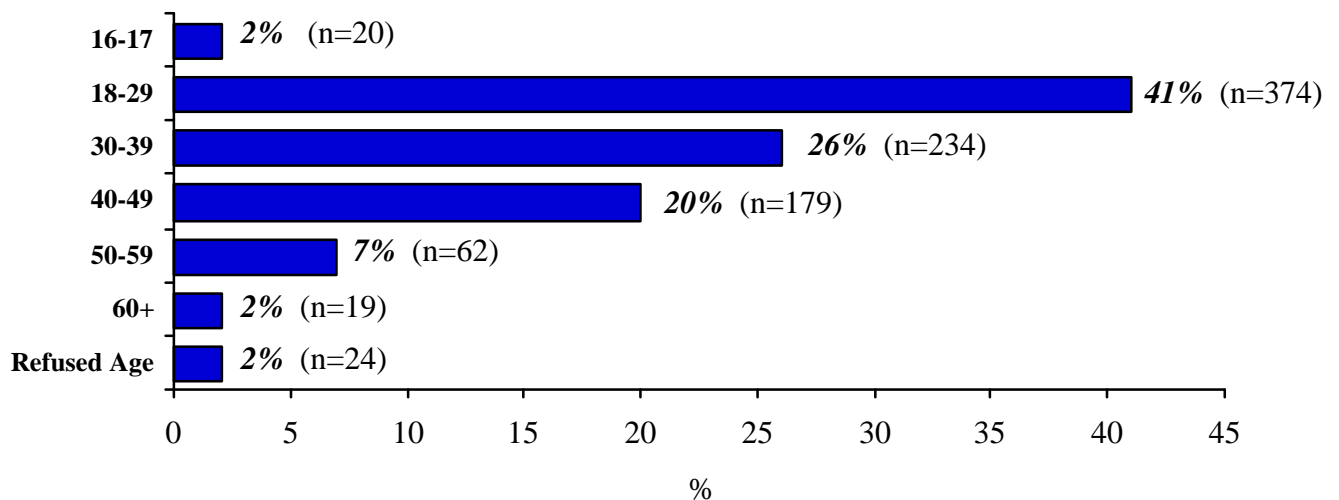
Based upon the 1,841 completed interviews, we found that approximately half of Cricket customers in this market do NOT have wireline telephone service in their home (n=912 of 1,841 respondents) based upon the following question:

*Some Cricket customers might choose to NOT have traditional wireline local telephone service in their home and, instead, use their Cricket phone for all of their calling needs. Do you have wireline local telephone service in your home?*



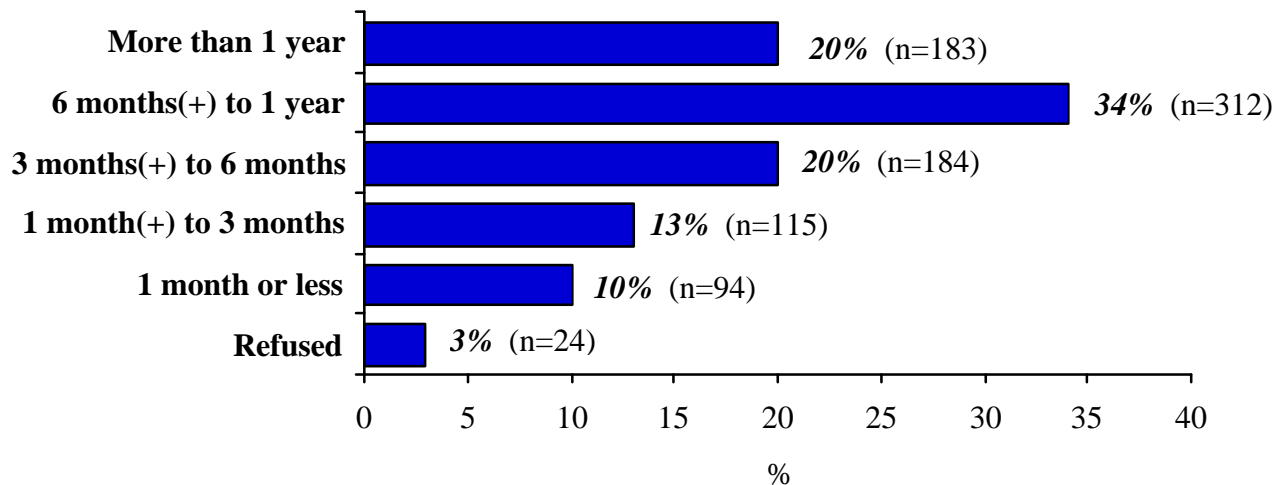
Of those Respondents who do not have wireline home telephone service, the breakdown by age is as follows:

*% Without Home Wireline Service: By Age (n=912 total)*



Of those Respondents who do not have wireline home telephone service, the breakdown by length of time they have had their Cricket service is as follows:

***% Without Home Wireline Service: By Length of Time with Cricket Service  
(n=912 total)***

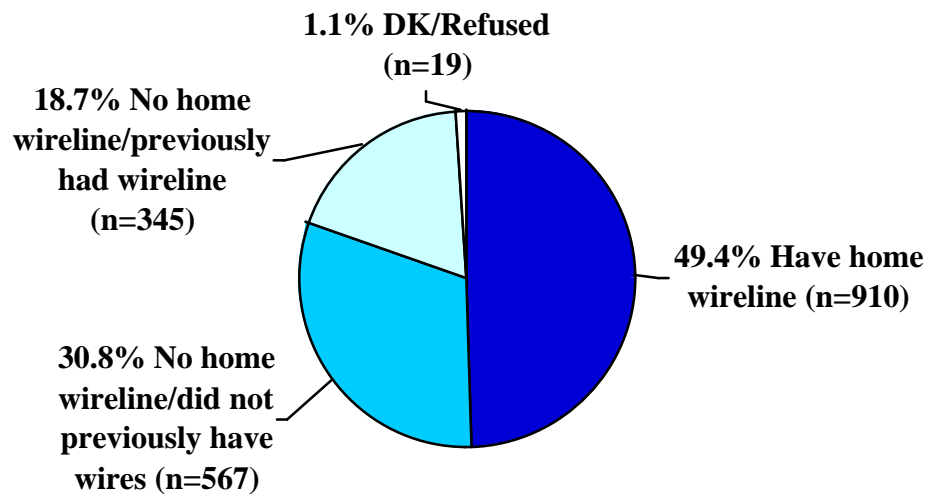


**3. Cricket Customers Without Wireline Phone Service Who Disconnected or Terminated Such Service Because They Obtained Cricket's Service.**

The 912 respondents who do not have wireline telephone service in their home were then asked the following question:

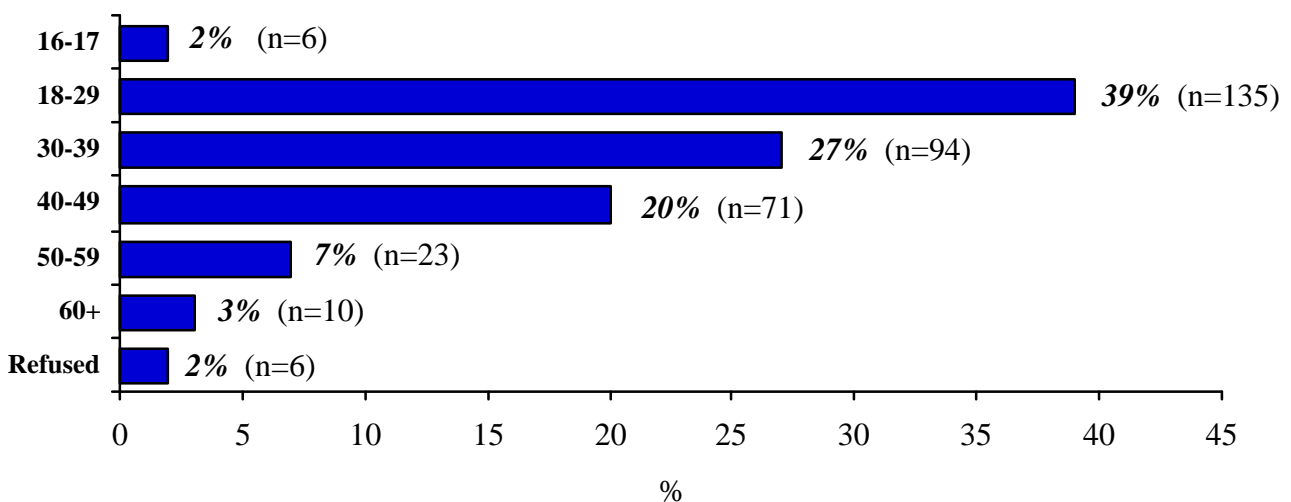
***If "No wireline local telephone service" – Did you previously have in your home, wireline local telephone service that was disconnected or terminated because you decided to have a Cricket phone?***

Of the 912 respondents who have no wireline phone service, 345 of the Respondents answered affirmatively to previously having home wireline service (n=345 of 912 respondents). This represents 18.7% of all survey respondents.



Of those Respondents who disconnected their prior wireline service (18.7%; n=345 of 1,841 respondents), the breakdown by age is as follows:

*Age of Those Non-Wired/Previously Wired (n=345 total)*



Of those Respondents who disconnected their prior wireline service, the breakdown by length of time they have had their Cricket service is as follows:

***Length of Cricket Service of Those Non-Wired/Previously Wired (n=345 total)***

